

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:22-CR-085
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	
)	
CHRISTOPHER FICKLIN,)	<u>JOINT MOTION TO CONTINUE DATES</u>
)	<u>AND DEADLINES</u>
Defendant.)	

Now comes the United States of America, by and through counsel, Michelle M. Baeppler, First Assistant United States Attorney, and Margaret A. Sweeney, Assistant United States Attorney, and the Defendant Christopher Ficklin, by and through counsel Steven L. Bradley, and hereby move this Honorable Court to continue the dates and deadlines in this matter.

On September 28, 2022, at the joint request of counsel, this Court continued the dates and deadline in this case, setting a change of plea hearing for October 27, 2022. The Court also continued the deadline for the United States' response to Defendant's Motion to Dismiss for November 3, 2022.

Since that time, the parties have agreed to the essential terms of a plea agreement. However, the parties are continuing to negotiate matters relating to forfeiture, and the parties require additional time to finalize the forfeiture terms of an agreement. Therefore, the parties are jointly requesting that this Court continue the Change of Plea hearing until November 17, 2022. Additionally, the United States requests, and the Defendant does not object, that the Court continue the motion response deadline to November 24, 2022.

The parties submit that the ends of justice are served by granting this motion and that this Motion is not made for any improper purpose. Therefore, the parties respectfully request that this Court grant the parties' request.

Respectfully submitted,

MICHELLE M. BAEPLER
First Assistant United States Attorney

By: /s/ Margaret A. Sweeney
Margaret A. Sweeney (OH: 0086591)
Assistant U.S. Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852
(216) 622-3990
Margaret.Sweeney@usdoj.gov